

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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*PROPOSED ATTORNEYS FOR DEBTOR*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>  
Debtor.

LTL MANAGEMENT LLC,  
Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO  
COMPLAINT and JOHN AND JANE  
DOES 1 1000,  
Defendants.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Adv. No.: 23-01092 (MBK)

**NOTICE OF AMENDED<sup>2</sup> AGENDA OF MATTERS  
SCHEDULED FOR HEARING ON MAY 16, 2023 AT 10:00 A.M.**

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

<sup>2</sup> **Amended agenda items appear in bold.**

*At the direction of the Court, the hearing will be held via Zoom only. All parties who intend to present argument should contact Chambers at [chambers\\_of\\_mbk@njb.uscourts.gov](mailto:chambers_of_mbk@njb.uscourts.gov) and provide the name and email address of the speaker, as well as provide information regarding the party the speaker represents and/or the purpose of the appearance.*

*Parties are directed to <https://www.njb.uscourts.gov/LTL> for observing via Zoom.*

*Please take notice that in light of the additional filings, tomorrow's hearing (May 16, 2023) will now begin at 10:00 a.m.*

#### **STATUS CONFERENCES GOING FORWARD IN BASE CASE**

1. At the direction of the Court, a status conference will go forward to discuss the scheduling of additional omnibus hearing dates.
2. Motions to Dismiss the Chapter 11 Case [Dkts. 286, 335, 346, 350, 352, 358, 379, 384, 473, 480].

**Status: The Court will conduct a conference to hear any updates from the parties on the scheduling of the pending motions to dismiss.**

3. Debtor's Motion for an Order (I) Scheduling Hearing on Approval of Disclosure Statement; (II) Establishing Disclosure Statement Objection Deadline; and (III) Granting Related Relief [Dkt. 240] (the "Disclosure Statement Hearing Motion").

**Status: A status conference on this matter is going forward pursuant to the Court's May 4, 2023 order.**

Objection Deadline: May 5, 2023.

Related Documents:

- A. Application for Order Shortening Time and Certain Other Relief [Dkt. 241].
- B. The Official Committee of Talc Claimants' Objection to Debtor's Application for Order Shortening Time with Respect to Debtor's Motion for an Order (I) Scheduling Hearing on Approval of Disclosure Statement; (II) Establishing Disclosure Statement Objection Deadline; and (III) Granting Related Relief [Dkt. 254].
- C. Order Denying Application to Shorten Time [Dkt. 272].
- D. The Official Committee of Talc Claimants' Cross-Motion for Entry of an Order (I) Temporarily Suspending the Debtor's Chapter 11 Case Pursuant to 11 U.S.C. §§ 105 and 305, and (II) Granting Related Relief [Dkt. 414] (the "Motion to Suspend").

- E. The Ad Hoc Committee of Supporting Counsel's Reply in Support of the Disclosure Statement Hearing Motion [Dkt. 498].
- F. The Debtor's Reply in Support of Disclosure Statement Hearing Motion [Dkt. 500].

Objections:

- G. The Official Committee of Talc Claimants' Objection to Disclosure Statement Hearing Motion [Dkt. 413].
- H. Arnold & Itkin LLP's Objection to Disclosure Statement Hearing Motion [Dkt. 443].
- I. The United States Trustee's Objection to Disclosure Statement Hearing Motion [Dkt. 448].
- J. MRHFM's Objection to Disclosure Statement Hearing Motion [Dkt. 453].

**CONTESTED MATTERS GOING FORWARD IN THE BASE CASE AND THE ADVERSARY PROCEEDING**

- 4. Motion to Suspend.

**Status: This matter is going forward.**

Objection Deadline: May 12, 2023.

Related Documents:

- A. The Disclosure Statement Hearing Motion.
- B. **MRHFM's Joinder to Motion to Suspend [Dkt. 503].**
- C. **The Official Committee of Talc Claimants' Reply in Support of Motion to Suspend [Dkt. 517].**

Objections:

- D. The Ad Hoc Committee of Supporting Counsel's Objection to the Motion to Suspend [Dkt. 497].
  - E. The Debtor's Objection to the Motion to Suspend [Dkt. 501].
- 5. The Official Committee of Talc Claimants' Motion for Entry of a Protective Order [Dkt. 439] (the "Committee Motion for Protective Order").

**Status: This matter is going forward.**

Objection Deadline: At hearing, pursuant to the Order Granting the Application to Shorten Time [Dkt. 444] (the “Order Shortening Time”).

Related Documents:

- A. Application for Order Shortening Time and Certain Other Relief [Dkt. 442] (the “Application to Shorten Time”).
- B. Order Shortening Time.
- C. The Debtor’s Cross-Motion for Protective Order [Dkt. 491] (the “Debtor’s Motion for Protective Order”).

Objections:

- D. The Debtor’s Objection to the Committee Motion for Protective Order [Dkt. 492].
6. The Official Committee of Talc Claimants’ Motion to De-Designate Exhibit A of Term Sheet [Dkt. 440] (the “Motion to De-Designate”).

**Status: This matter is going forward.**

Objection Deadline: At hearing, pursuant to the Order Shortening Time.

Related Documents:

- A. The Application to Shorten Time.
- B. The Order Shortening Time.
- C. The Committee Motion for Protective Order.
- D. Certain Creditor Mesothelioma Claimants’ Objection to the Debtor’s Confidentiality Designations [Adv. Dkt. 95].
- E. The Official Committee of Talc Claimants’ Correspondence to the Court [Adv. Dkt. 98].
- F. MRHFM’s Objection to Debtor’s Confidentiality Designations [Adv. Dkt. 99].
- G. **MRHFM’s Joinder to the Motion to De-Designate [Dkt. 507].**

Objections:

- H. **The Debtor’s Objection to the Motion to De-Designate [Dkt. 523; Adv. Dkt. 136].**

7. The Official Committee of Talc Claimants' Motion to Compel [Dkt. 441] (the "Motion to Compel").

**Status: This matter is going forward.**

Objection Deadline: At hearing, pursuant to the Order Shortening Time.

Related Documents:

- A. The Application to Shorten Time.
- B. The Order Shortening Time.
- C. **MRHFM's Joinder to the Motion to Compel [Dkt. 528].**

**Objections:**

- D. **Johnson & Johnson's Objection to the Motion to Compel [Dkt. 519].**
- E. **The Debtor's Objection to the Motion to Compel [Dkt. 524].**

8. The Debtor's Cross-Motion for a Protective Order.

**Status: This matter is going forward.**

Objection Deadline: At hearing, pursuant to the Order Shortening Time.

Related Documents:

- A. The Application to Shorten Time.
- B. The Order Shortening Time.
- C. The Committee Motion for Protective Order.
- D. The Motion to De-Designate.
- E. The Motion to Compel.

**Objections:**

- F. **The Official Committee of Talc Claimants' Objection to the Debtor's Cross-Motion for a Protective Order [Dkt. 510].**

9. **The Official Committee of Talc Claimants' Motion to Compel Unredacted Documents [Dkt. 504] (the "Second Motion to Compel").**

**Status: This matter is going forward.**

**Objection Deadline:** At hearing, pursuant to the Order Granting Application for Order Shortening Time and Certain Other Relief [Dkt. 509] (the “**Order Shortening Time and Other Relief**”).

**Related Documents:**

- A. Application for Order Shortening Time and Certain Other Relief [Dkt. 505].
- B. Order Shortening Time and Other Relief.

**Objections:**

- C. The Debtor’s Objection to the Second Motion to Compel [Dkt. 529].

Dated: May 15, 2023

**WOLLMUTH MAHER & DEUTSCH LLP**

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